

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Crim. No. 17-201-01 (ABJ)
PAUL J. MANAFORT, JR.,	)	
	)	
Defendant.	)	

DEFENDANT PAUL J. MANAFORT, JR.'S SECOND  
SUPPLEMENT TO MOTION TO MODIFY CONDITIONS OF RELEASE

Paul J. Manafort, Jr., by and through counsel, hereby provides further supplemental information to the Court in support of the fair market values of the properties to be pledged as security for bond.

On December 11, 2017, defendant Manafort filed a supplement to his motion to modify conditions of release (ECF #85) which included the following information: comparable sales and listing data for 123 Baxter Street, New York, NY; real estate tax assessment and appraised fair market value for 601 North Fairfax Street, Alexandria, VA; and real estate tax assessment and appraised fair market value (and comparable sales data) for 10 St. James Drive, Palm Beach Gardens, FL. On December 13, 2017, the Court entered a Minute Order directing the defendant to inform the Court by December 15, 2017, whether the record for the valuations of the three properties was complete. The defendant provides the Court with the following additional information concerning his December 11 supplemental submission.

123 Baxter Street, New York, NY

New York City does not provide fair market value for its tax assessments. Nevertheless, counsel confirmed with a New York City real estate broker that the four properties identified in the December 11 supplement are comparable to the Baxter Street property.

The Baxter Street property is a high-end condominium, and the comparable criteria include square footage, number of bedrooms, floor level, whether it is a full-service building, direct parking, elevator access, and location. Three of the comparable properties are recent sales; one is a current listing. Of the properties identified, it should be noted that the price range was relatively narrow – from \$4.5 million to \$5.2 million. The Baxter Street property was purchased in 2007 for \$2.5 million. Substantial improvements were made to the property including new HVAC, new floors, new master bathroom, upgraded kitchen, upgraded powder room and second bathrooms. The valuation submitted to the Court is well within the range of the comparable properties identified in the December 11 supplemental filing.

601 North Fairfax Street, Alexandria, VA

This property is a newly constructed condominium overlooking the Potomac River. It was purchased in 2015 for \$2.88 million. The City of Alexandria, VA, has officially assessed the current fair market value of the property to be over \$3 million, as per the printout of this online record previously submitted on December 11, 2017. This valuation of this property is greater than the estimated value of the property that was submitted to the Court.

10 St. James Drive, Palm Beach Gardens, FL

The Florida property was purchased in 2007 for \$1.5 million, as indicated in the official documentation previously submitted on December 11. Since then, numerous improvements to the property have been undertaken, including doubling the size of the guest house, and an upgraded kitchen, powder room and living room. Palm Beach County, FL, assesses the fair market value to be over \$1 million. The county conducts fair market value appraisals every five years. Based upon recent comparable sales information, it appears that the county assessment of fair market value is dated. The comparable properties selected are all from the same development in Palm Beach Gardens. These sales range from \$1.25 to \$1.6 million and thus support the valuation previously submitted to the Court.

NATURE OF OTHER ASSETS IN ECF #64-1

Mr. Manafort and his wife Kathleen jointly own the marketable securities, insurance policies and cash listed on the statement of net assets. Mr. Manafort holds the other investment and loan individually.

Dated: December 14, 2017

Respectfully submitted,

---

Kevin M. Downing  
(DC Bar # 1013984)  
Thomas E. Zehnle  
(DC Bar #415556)  
815 Connecticut Avenue  
Suite 730  
Washington, DC 20006  
(202) 754-1992